

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE**

UNITED STATES OF AMERICA)	
)	
v.)	No. 2:20-CR-65
)	JUDGE GREER
EMORY Q. JACKSON)	

**JOINT MOTION TO CONTINUE THE DEADLINES AND EXTEND THE OBJECTION
PERIOD FOR THE REPORT AND RECOMMENDATIONS**

Comes now, the United States of America, by and through J. Douglas Overbey,
United States Attorney for the Eastern District of Tennessee, and hereby files this Joint Motion
to Continue the Deadlines and to Extend the Objection Period for the Report and
Recommendation, and would show the following in support of:

1. The defendant Emory Q. Jackson was indicted by the federal Grand Jury on September 1,
2020 in a one count indictment.
2. The plea deadline in this case was set on November 19, 2020, with a trial date on
December 3, 2020.
3. On September 22, 2020, the defendant filed a Motion to Suppress and a Motion to
Exclude Evidence of Prior and/or Other Acts in this matter. The evidentiary hearing was
held on October 13, 2020.
4. The court filed a Report and Recommendations for this Motion on October 31, 2020, and
ordered that objections to the Report and Recommendations were due on November 6,
2020, with responses to any objections due on November 13, 2020. The Court also
ordered the government and the defendant to notify the Court of any unresolved issues
regarding the defendant's Motion to Exclude Evidence of Prior and/or Other Acts by
November 6, 2020.

5. The government has discussed this with the defendant's counsel and agrees that more time is necessary to prepare any objections. COVID-19 has made it difficult for the defendant's counsel to thoroughly discuss the Report and Recommendations with the defendant. Additionally, a transcript of the October 13 hearing is needed in order to adequately prepare, therefore the government and the defendant respectfully request that a 14-day extension will be granted to file objections to the Report and Recommendations.
6. The government and the defendant have not been able to thoroughly address the evidentiary issues in the defendant's Motion to Exclude Evidence of Prior and/or Other Acts, and would request a 14-day extension to notify the court of any unresolved questions.
7. As these extensions would be incompatible with the current deadlines, the government discussed this with the defendant's counsel and agrees that a continuance for the current plea deadline and the trial is necessary. Additional time would be needed to review any decisions if objections are filed, as well as to engage in any further plea negotiations or prepare for trial. Furthermore, the parties are still waiting on the testing results of the firearm at issue, which is being analyzed by the Tennessee Bureau of Investigation. The government and the defendant would respectfully request that the current plea deadline and trial date be continued in this matter.

WHEREFORE, both the United States and the defendant respectfully request that this Court grant the relief sought herein.

Respectfully submitted,

J. DOUGLAS OVERBEY
United States Attorney

By: s/ **KATERI L. DAHL**

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of November, 2020, a true and accurate copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular United States mail. Parties may access this filing through the Court's electronic filing system.

s/ **KATERI L. DAHL**

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